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July 20, 2017

Regarding Docket No. 12-354:

I am writing on behalf of MetaLINK Technologies, Inc. (MetaLINK) to express our opposition to the petitions filed by CTIA and T-Mobile regarding proposed changes to the CBRS band.

MetaLINK is a rural regional fixed broadband provider with service offerings in Northwest Ohio, Northeast Indiana, and Southern Michigan. Founded in 1996 as a dial-up Internet service provider (ISP), over the years we have transitioned our network to provide broadband Internet via fixed wireless and today serve over 8,500 customers. What we need today is dedicated, affordable, renewable spectrum for small rural provider's and the offering of CBRS is a step in the right direction.

The problem that we have been facing in the unlicensed bands is coverage limitations and increased congestion which hinders the ability to serve everyone with the faster speeds that they are requesting. We had been using the existing 3.650-3.700 MHz band to little success until the beginning of 2016 when we made a conscious decision on our future based on industry news. Since then we have heavily invested in LTE with both time and money. We are excited with the CBRS band for what it will bring to our coverage which includes better coverage area, faster Internet speeds, and an enhanced quality of service.

While we have anxiously been awaiting the formal role-out of the CBRS band and our future, it came to us as a shock to learn about the last minute petitions from CTIA and T-Mobile. These petitions, if accepted, may exclude us from utilizing the CBRS band. Though we knew that we were taking a risk by investing in learning more about LTE until the CBRS band was officially approved, we were doing such for the citizens of our rural coverage area in order to quickly deploy the newest technology upon its final approval. This is what are customers have been waiting for.

Again, to reiterate, we are opposed to both of these petitions and I feel comfortable in saying that the residence in our coverage area would agree. Customers need to have the choice of providers and the providers need to have the ability to affordably offer competitive services to enhance the broadband Internet experience in rural America. Please allow us the opportunity to provide these services by striking these petitions and by moving forward quickly and expeditiously with what has already been agreed upon.

Sincerely,

Todd Harpest

Regulatory Manager